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April 8, 2024

By ECF

Honorable Jed S. Rakoff
United States District Court
Southern District of New
York

**Re: *National Coalition on Black Civic Participation v. Jacob Wohl*,
SDNY Case No. 20-cv-8668 JSR**

Dear Judge Rakoff:

On behalf of all Plaintiffs and Defendants, Plaintiff-Intervenor the People of the State of New York submits a fully executed proposed Consent Decree settling all pending claims in this matter. The parties respectfully that the Court so-order the Consent Decree and dismiss the matter except with respect to the enforcement of injunctive relief, as set forth in the proposed Consent Decree.

The parties are prepared to respond to any questions or concerns the Court may have.

Respectfully,

/s/ Richard Sawyer

Richard Sawyer
Section Chief
Civil Rights Bureau
New York State
Office of the Attorney General

Encl.

cc: All counsel of record (via ECF)